

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**Ref. No.: 2148**

**HORIZON MEDIA LLC’S RESERVATION OF RIGHTS TO  
TWENTY-THIRD NOTICE OF REJECTION OF  
CERTAIN EXECUTORY CONTRACTS AND/OR UNEXPIRED LEASES**

Horizon Media LLC a/k/a Horizon Big, LLC (“Horizon”), by and through its counsel, files this reservation of rights to the *Twenty-Third Notice of Rejection of Certain Executory Contracts and/or Unexpired Leases* [D.I. 2148], under which the above-captioned debtors (the “Debtors”) have indicated their intent to reject certain executory contracts with Horizon as of February 28, 2025 (the contracts being the “Horizon Contracts”).

Horizon reserves all of its rights to continue to assert all applicable amounts owed under the Horizon Contracts as an administrative expense claim or otherwise as applicable. On February 5, 2025, Horizon filed a motion seeking the allowance and payment of an administrative expense claim in connection with post-petition amounts that the Debtors owed Horizon under certain of the Horizon Contracts [D.I. 1941] (the “Horizon Administrative Expense Claim Motion”).

Part of the amounts owed to Horizon under the Horizon Contracts came due from the Petition Date through and including January 3, 2025 (the “Pre-Closing Administrative Claim”)

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277).

and are being administered pursuant to the procedures set forth in the *Order (I) Setting a Bar Date for Filing Proofs of Claims for Pre-Closing Administrative Expense Claims Against the Debtors, (II) Establishing Pre-Closing Administrative Expense Claims Procedures, and (III) Granting Related Relief, Including Notice and Filing Procedures* [D.I. 2214]. Additionally, part of the amounts owed to Horizon under the Horizon Contracts came due between January 4, 2025 to February 28, 2025 – the effective rejection date (the “Post-Closing Administrative Claim”). Horizon continues to assert both the Pre-Closing Administrative Claim and Post-Closing Administrative Claim as administrative expense claims under the Horizon Administrative Expense Claim Motion notwithstanding the rejection of the Horizon Contracts and reserves all rights with respect thereto. Horizon further reserves all rights with respect to any additional claims that it may have against the Debtors, including, but not limited to, claims for rejection damages.

Dated: March 14, 2025  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

/s/ Joshua B. Brooks

Kimberly A. Brown (No. 3157)  
Joshua B. Brooks (No. 6765)  
919 Market Street, Suite 1800  
Wilmington, Delaware 19801  
Telephone: (302) 467-4400  
Email: brown@lrclaw.com  
brooks@lrclaw.com

**LOEB & LOEB LLP**

William M. Hawkins (admitted *pro hac vice*)  
Noah Weingarten (admitted *pro hac vice*)  
Alexis Zobeideh (admitted *pro hac vice*)  
345 Park Avenue  
New York, NY 10154  
Telephone: (212) 407-4000  
Email: whawkins@loeb.com  
nweingarten@loeb.com  
azobeideh@loeb.com

*Counsel to Creditor  
Horizon Media LLC*